

INTRODUCTION

OVERVIEW

Environmental regulations are becoming increasingly complex and costly for both private and public sector regulated entities. Federal agencies, however, differ from the private sector in how they must comply with those regulations. The goal of reducing the national debt has led to a simultaneous decrease in available Federal agency budgets for environmental and other program areas. Thus, Federal agencies are being asked to do more with less -- comply with all applicable environmental regulations while utilizing fewer resources to accomplish the goal of full compliance. An environmental audit is one tool that Federal agencies can use to comply with the regulations, as well as to improve the efficiency of operations and conserve limited fiscal and labor resources.

A number of factors must be considered when designing and implementing a Federal agency environmental audit program. In developing an effective audit program, an agency environmental manager must always remain aware that: (1) the audit program should complement and contribute to the agency mission; (2) securing funding for the audit program and the implementation of audit findings must be an integral part of the agency budgeting process; (3) national security issues may impact the nature of the audit program; (4) federal facilities may be owned and operated by different public and private entities; and (5) the missions and operations of federal facilities vary widely and, as a result, the audit program must be flexible enough to be applicable to all agency facilities, while still allowing for the comparison of audit results between facilities.

This document is not a “how to” manual for conducting environmental audits. A detailed discussion of environmental auditing protocols, i.e., the “how to” of environmental auditing is contained in EPA’s Generic Protocol for Conducting Environmental Audits of Federal Facilities, (“Protocol”) (EPA # 300-B-95-002). The Protocol provides specific information on the various media and statutes implicated in environmental auditing, and provides detailed descriptions of how to conduct a facility audit and establish an audit program. Careful review and adherence to the Protocol should allow one to develop a sound audit program. In short, the Protocol is an environmental auditing instruction manual as well as a design manual for establishing an environmental auditing program.

This document describes the components of a thorough environmental management program and informs the reader about the kinds of issues that arise and require addressing in environmental audits. It addresses programmatic issues in that it identifies the elements of a sound environmental auditing program, including management elements, resources, both human and capital that are typically required in establishing an auditing system, and provides general guidance on what is required of a thorough environmental auditing program. However, this document does not provide detailed descriptions of how to actually conduct an audit nor does it tell the reader the precise and detailed steps to follow in creating an environmental management program. This document is intended to be informative not instructional, and should be used in conjunction with the Protocols in order to create and undertake an environmental auditing program .